



United University Professions

Office of Information and Regulatory Affairs
Office of Management and Budget
Attn: Desk Officer for U.S. Department of Education

January 2, 2015

To Whom It May Concern:

Please consider the comments below as you assess the information collection and related costs associated with the Department of Education's proposed regulations to implement requirements for the teacher preparation program accountability system under Title II of the Higher Education Act of 1965, as amended (posted in Federal Register, Vol. 79, No. 232, December 3, 2014). As president of the nation's largest higher education union, United University Professions (UUP), I represent faculty and professional staff at 29 State University of New York (SUNY) campuses. Seventeen SUNY campuses have a broad array of teacher preparation programs. UUP maintains a Teacher Education Task Force, with representatives from all 17 of those campuses. We have been actively engaged in work with faculty and staff, campus administrators, and the New York State Department of Education to address challenges facing teacher education in our state. Our comments represent concerns voiced by teacher education professionals across the SUNY system.

To begin with, we see the proposed regulations as having a lack of significant benefits. This lack is exacerbated by the fact that inadequate proposed funding will negatively affect teacher education programs, potentially creating a more harmful situation in relation to the Department of Education's stated goals. Most significantly, DOE has not accurately accounted for the data collection and accountability measures already under expansion in most programs, thereby neglecting the impact of new underfunded mandates. This raises two additional concerns:

1. There is no evidence that the newly proposed data collection requirements will yield more useful information than that which is already being collected. For example, teacher preparation programs have been expanding their data collection to meet new standards developed by the Council for the Accreditation of Educator Preparation (CAEP) as well as field-specific standards-setting bodies. Teacher preparation programs are being held accountable to a complex set of internal and external assessment bodies. While it is important to continue to improve data collection and assessment, imposing new, underfunded mandates out of the context of new standards and methods already under development, is neither educationally sound nor cost effective.
2. Imposing new data requirements with little substantiation of their benefit, particularly without adequate funding, will risk derailment of the beneficial work

that is already underway in programs that are strapped for resources. At public colleges and universities in particular, which DOE reports as constituting 37 percent of the Institutions of Higher Education with teacher preparation programs, chronic underfunding is making it very difficult to maintain the staffing and resources needed to meet continually improving standards and accreditation requirements.

Please consider the following illustrations of challenges facing teacher preparation programs in New York State in relation the concerns expressed above.

The situation in New York State provides a clear example of the difficulties that will be created by the proposed federally imposed requirements. DOE estimates that it will require four hours of work for each institution of higher education to be able to accommodate new data reporting, which will involve transitioning from aggregated to disaggregated program data. This is a very serious underestimate. As one indication of this, it is important to consider New York State's recent experience in trying to develop a new system of institutional profiles for teacher preparation programs. Since it began to solicit input from stakeholders in 2012, NYS has continued to have difficulties refining its data profile requirements to ensure data collection that yields useful information. Furthermore, this process has imposed staffing and resource demands on our colleges and universities without adequate funding. The experience in our state makes it clear that a four hour estimated work increase for new federal regulations is ludicrous. Furthermore, a new federal mandate layered on top of a process that is already underway will not be beneficial.

In addition to negative impacts at the institutional level, we believe the New York State Department of Education would be hard pressed to meet new requirements under existing staffing and funding constraints. The American Institutions of Research has estimated that the proposed new federal regulations would require the work of two or three full time state employees for the first two years of implementation. The New York State Education Department is already operating with minimal staffing and has been unable to provide quality data reporting under current circumstances. This is evidenced by a recent posting of teacher certification exam pass rate data that many institutions have reported to be highly inaccurate in relation to their institutional records. At this point, we do not believe the New York State Education Department has the capacity to handle the additional work the new regulations would require without funding for new staff.

Public colleges and universities in New York State have struggled to maintain and enhance the quality of their teacher preparation programs, undergoing considerable expansion of their data collection and assessment practices for both internal evaluation and external accreditation. United University Professions continues to get reports about chronic understaffing and inadequate funding for the data collection and reporting operations at our campuses. In addition, data collection begins at the education program level. Faculty and staff have seen substantial increases in the time they must spend collecting information for assessment and accreditation purposes. In the context of faculty and staff reductions in recent years, this often takes needed time away from teaching, student teacher supervision, and other student needs. The new proposed federal regulations will impose new unfunded mandates at a time when traditional teacher preparation programs are already heavily engaged in a process of developing new standards, data collection, and accountability measures. The new federal regulations will

unduly burden traditional programs without adding benefits to the work that's already underway.

In conclusion, the Department of Education has presented the proposed regulations as key to collecting meaningful information about teacher preparation program quality. However, they have failed to demonstrate whether and how the new regulations will enhance the quality of data collection, particularly in light of massive efforts already underway in New York State and elsewhere. Inadequate funding for these new requirements will lead to a derailment of efforts that are yielding many improvements across institutions and states.

It is the position of UUP that the proposed regulations represent not only federal overreach, but also federal intervention in a manner that could impede state and institutional progress that is already underway.

Sincerely,
Frederick E. Kowal, President
United University Professions